

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WALDIR DACOSTA,

Plaintiff,

V.

MICHAEL CHERTOFF, et al.,

Defendants.

C.A. NO. 05-11063-RGS

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PLAINTIFF'S (ASSENTED TO) MOTION TO STAY

The Plaintiff Waldir Da Costa (the "Plaintiff") respectfully moves to stay the above-captioned matter for a period of ninety (90) days. In support thereof, the Plaintiff states as follows:

1. The above-captioned matter arises from the Plaintiff's Application to Adjust to Lawfully Permanent Resident (the "Application"), which has been pending before the United States Citizenship & Immigration Services ("USCIS") since February 20, 2002.
2. USCIS recently indicated that it had completed a review of the Plaintiff's Application and had questions regarding the Plaintiff's prior work experience in Brazil.
3. The Plaintiff has submitted documents to USCIS and is hopeful that the Application can be adjudicated based on the documents provided. The USCIS asserts that it will need to verify the information contained in these documents through diplomatic channels in

Brazil and anticipates that it will need an additional ninety (90) days to do so. Defendant has begun the diplomatic process at this time.

4. Accordingly, the Plaintiff seeks an additional ninety (90) days of up to and including June 9, 2006 to conduct such a review.
5. Defendant assent to this motion for stay.

Based on foregoing and in the interests of judicial economy, the Plaintiff respectfully request that the above-captioned matter be stayed for a period of ninety (90) days.

Respectfully submitted,

WALDIR DA COSTA

By his attorneys,

By: /s/ Susan Zak
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Dated: March 20, 2006